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Via ECF and E-Mail

The application is ☒ granted.
☐ denied.

Dated: June 11, 2020
New York, New York 10007

Dear Judge Ramos:

As Your Honor is aware, I am counsel to Mr. Shawndale Lewis in the above-referenced matter, appointed pursuant to the provisions of the Criminal Justice Act (“CJA”), 18 U.S.C. §3006A. This correspondence is to respectfully request the modification of Mr. Lewis’s bail conditions.

Mr. Lewis has been at liberty on the following bail package: (i) a \$30,000 PRB; (ii) co-signed by two FRP's; (iii) home detention with location monitoring; (iv) surrender of travel documents; (v) travel restricted to the Southern and Eastern Districts of New York and the District of North Carolina for the purpose of attending court appearances; (vi) strict Pre-Trial Supervision; (vii) Mr. Lewis is not to have communications with the co-defendants; (viii) Mr. Lewis must seek and maintain employment; and (ix) Mr. Lewis is not to open any bank accounts, credit cards, lines of credit, or possess another person's identification unless approved by Pretrial Services. Since his release Mr. Lewis has complied with all conditions of his bail and has been in constant contact with counsel and Pretrial Services.

This application seeks the permanent modification of Mr. Lewis's above-stated bail conditions, from home confinement with location monitoring, to curfew enforced by electronic monitoring, with specific hours at the discretion of Pretrial Services. We re-

quest the less restrictive conditions and increased flexibility to accommodate the irregular work hours of Mr. Lewis's employment; and also so that Mr. Lewis will be able to spend more time with his daughter. In the event that the Court grants this request, all other bail conditions will remain unchanged.

Based upon my communications with A.U.S.A. Samuel P. Rothschild and Pretrial Services Officer Joshua Rothman, the Government and Pretrial Services consent to this request.

Therefore, for the reasons stated herein, we respectfully request that the Court grant this application modifying Mr. Lewis's bail conditions.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Richard J. Ma

Richard J. Ma, Esq.

cc: A.U.S.A. Samuel P. Rothschild (via email)
P.T.S. Officer Joshua Rothman (via email)